

EXHIBIT C

Subject to and without waiving the forgoing objections, Defendants provide the factual basis for a judicial immunity defense as follows: Chief Judge Gregory was acting in his official judicial capacity when he made the decisions to deny, in part, Plaintiff's motion for a continuance and defer ruling on her motion for disqualification.

Interrogatory No. 4: Identify all persons whom Defendants intend to call as witnesses at trial, including any expert(s), and give a summary of their anticipated testimony. Please organize your response by Defendant.

Objections and Response to Interrogatory No. 4:

Defendants object to this interrogatory to the extent that it requests information subject to any privilege or restriction on the release of information, including the attorney-client privilege, the attorney work product doctrine, and the deliberative process privilege.

Defendants further object to this interrogatory as premature, particularly in that discovery is ongoing in this case, and it is thus too soon for any determinations about witnesses to be called at trial or whether supplementation of Defendants' initial disclosures will be appropriate.

Defendants further object to this interrogatory to the extent it seeks disclosure of information beyond that required by the Federal Rules of Civil Procedure and Federal Rules of Evidence, including summaries of expected testimony at trial.

Subject to and without waiving the foregoing objections, Defendants will disclose information required by the Federal Rules of Civil Procedure, the Federal Rules of Evidence, and the applicable local rules in the time frames provided by those rules and any applicable court orders.

Interrogatory No. 5: Identify all persons from whom Defendants have received statements (oral or written) relating to the allegations set forth in the civil complaint, including any related denials